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June 22, 2015

VIA ECF

Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: LaQuana Chappelle, et al. v. Kim Jeter, et al., 15-cv-4187 (GBD)

Dear Judge Daniels:

I am the Assistant Corporation Counsel assigned to represent Defendants in the above-referenced matter. I write to respectfully request an extension of Defendants' time to respond to the Complaint. This is Defendants' first request for an extension. Plaintiffs' counsel consents to this request.

Plaintiffs commenced this action by filing a Complaint on or about June 1, 2015, alleging violations of their constitutional rights in connection with the temporary removal of Plaintiff LaQuana Chappelle's children in 2012 by the New York City Administration for Children's Services ("ACS"), and the associated family court proceedings. In the Complaint, Plaintiffs name the City of New York ("City"), former ACS Commissioner Ronald Richter, and ACS employees Kim Jeter, Sheila Bennett, Judy Enwright, and Jacqueline McKnight. Former Commissioner Richter signed and returned a Waiver of Service dated June 5, 2015, making his response to the Complaint due August 4, 2015. The City was served by personal service on June 2, 2015, making its response due June 23, 2015. Copies of the Summons and Complaint addressed to the four other named defendants were also received by ACS on June 2, 2015.

Given the nature of Plaintiffs' pleading, the additional time is necessary to allow this office to fully investigate Plaintiffs' allegations, research the applicable law, interview each of the individually-named Defendants, determine whether they will be represented by this office pursuant to New York General Municipal Law § 50-k(2), and prepare an appropriate response to the Complaint. In addition, extending the time to respond to the Complaint would allow for the possibility of submitting a single response to the Complaint on behalf of all Defendants, rather

than multiple responses on behalf of each Defendant based on their date of service, which would be more efficient for both the parties and the Court.

Accordingly, as Defendant Richter's response is currently due by August 4, 2015, I respectfully request that the time for all other Defendants to respond be extended until August 4, 2015.

Thank you for your consideration of this request.

Respectfully,

s/

Omar H. Tuffaha
Assistant Corporation Counsel

cc: Carolyn A. Kubitschek, Esq.
Attorney for Plaintiffs
(via ECF)